

**Parkview Community Hospital  
Medical Center**



July 28, 1995

David Werdegar, M.D., MPH, Director  
Health Policy & Planning Division  
Office of Statewide Health Planning and Development  
1600 Ninth Street, Room 400  
Sacramento, California 95814

Dear Dr. Werdegar:

Parkview Community Hospital Medical Center welcomes the opportunity to address risk adjusted medical outcomes to be published by OSHPD in regards to acute myocardial infarction, excision of intervertebral disk, and outcome of delivery. Noting that this is the second year for the State of California to publish risk adjusted outcomes and understanding that it takes time to develop a meaningful model for comparison purposes, the following comments are made as opportunities for future improvement of the data as well as a critique of this year's data to be published.

The following are pertinent evaluative comments:

1. Study reflects on the quality of the data submitted not quality of care or service provided.
2. The model does not include information regarding patients' outpatient status or chronic disease treatment in the outpatient setting.
3. It should be noted that there is no information regarding the physiological functional status of patients on admission to the health care facility.
4. Existing conditions prior to admission are sometimes classified as complications rather than comorbidities.
5. Hospital's reporting of complications is inconsistent.
6. The ICD-9-CM coding guidelines are often vague and subjective to varying interpretation and are utilized for reimbursement purposes.
7. The quality of coding varies markedly across hospitals.
8. No information is available about specific physician practice variables (i.e. higher risk patients based on physician specific background and experience).

In conclusion, we would like to comment that Parkview Community Hospital Medical Center was within the 95 percent confidence intervals in all three areas and had no significance in the P-values.

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Paul Boynton, M.D., Chairman  
Performance Management Committee

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